

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
YELLOW CORPORATION, et al.,)	Case No.: 23-11069 (CTG)
)	Administratively consolidated
)	
Debtors.)	Hearing Date: October 23,
)	2023 at 10:00 a.m. (ET)
)	
)	Objection due: October 2, 2023
)	

NOTICE OF MOTION OF TSC EQUIPMENT FINANCE, LLC TO COMPEL DEBTOR YRC, INC. TO ASSUME OR REJECT EQUIPMENT LEASE COVERING APPROXIMATELY 246 WABASH DURAPLATE PUP TRAILERS; B) FOR RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d) TO PERMIT MOVANT TO EXERCISE RIGHTS AND ENFORCE REMEDIES AGAINST DEBTOR YRC, INC. WITH RESPECT TO EQUIPMENT LEASE AND TRAILERS; AND (C) TO WAIVE THE 14-DAY STAY OF ENFORCEMENT PURSUANT TO F.R.B.P. 4001(a)(3)

PLEASE TAKE NOTICE that on September 14, 2023, TSC Equipment Finance, LLC (“Movant”) filed the attached Motion to A) Compel Debtor YRC, Inc., to assume or reject equipment lease covering approximately 246 Wabash Duraplate Pup Trailers; B) for relief from the automatic stay pursuant to 11 U.S.C. § 362(d) to permit Movant to exercise rights and enforce remedies against Debtor with respect to equipment lease and trailers; and C) to waive the 14-day stay of enforcement pursuant to F.R.B.P. 4001(a)(3) (“Motion”).

PLEASE TAKE FURTHER NOTICE that objections or responses, if any, to the Motion must be filed with the Bankruptcy Court, 824 N. Market Street, Third Floor, Wilmington, Delaware 19801, on or before **October 2, 2023** and served upon the undersigned counsel to Movant.

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the Motion will be held on **October 23, 2023 at 10:00 a.m. (Eastern Time)** before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge, at the Bankruptcy Court, 824 Market Street, Third Floor, Courtroom No. 7, Wilmington, Delaware 19801. The hearing date specified above, may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND TO THE MOTION IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

Respectfully submitted,

Date: September 15, 2023
Wilmington, Delaware

BUCHANAN INGERSOLL & ROONEY PC

/s/ Kody M. Sparks

Geoffrey G. Grivner, Esq. (#4711)

Kody M. Sparks, Esq. (#6464)

500 Delaware Avenue, Suite 720

Wilmington, DE 19801

Tel: (302) 552-4200

Fax: (302) 552-4295

geoffrey.grivner@bipc.com

kody.sparks@bipc.com

OF COUNSEL:

Timothy P. Palmer, Esq. (*pro hac vice*)

PA Bar I.D. No. 86165

BUCHANAN INGERSOLL & ROONEY PC

Union Trust Building

501 Grant Street, Ste. 200

Pittsburgh, PA 15219

Tel: (412) 562-8800

timothy.palmer@bipc.com

Attorneys for TSC Equipment Finance LLC